REMARKS

New claims 63 and 64 being added by this Amendment are exact copies of claims 9

and 14, respectively, of U.S. patent no. 5,644,539 - Yamagami et al., a copy of which is being filed

herewith.

Dated: _June 22, 1998_

Respectfully submitted,

Gerald P. Parsons, Reg. No. 24,486
MAJESTIC, PARSONS, SIEBERT & HSUE P.C.
Four Embarcadero Center, Suite 1100
San Francisco, California 94111-4106
Telephone: (415) 248-5500

Atty. Docket: HARI.006USP

Facsimile: (415) 362-5418

Interference Count Proposal

1.   Application (09/108,084) contains claims 16-20 and application claim (07/981,438) contains claims 1-21.

Claims 16-20 of application '084 and claims 9-11, 13, and 14 of application '438 define the same patentable invention. If an interference is declared, there will be one (1) count : Count 1.

Claims 16-20 of application '084 and claims 9-11, 13, and 14 of application '438 would be designated to correspond to the count 1.

Claims 16-20 are *identical* to count 1.

Interference Count Explanation

2.   Claims 16 and 18 of application '084 and claim 9 of application '438 are designated as corresponding to count 1 because both claims recite an identical patentable invention, and both claims are directed to the following identical language : "A storage device employing a flash memory including a logical address conversion means, a memory controller..., wherein said logical address conversion means converts a logical address received in the writing operation to the physical address which is different from the physical address to which said logical address conversion means converted to a logical address, identical to the logical address to be presently converted, in a preceding writing operation."

Claim 17 of application '084 and claim 10 of application '438 are designated as

corresponding to count 1 because both claims are identical, and both claims are directed to the

following identical language : " A storage a device having a logical address reference means, a

physical address reference means..., wherein said logical address conversion means converts a

respective logical address into a physical address corresponding thereto with referring to said

logical address reference means in the reading operations and converts the logical address

received in the writing operation to the physical address registered in said physical address

reference means."

Claim 18 of application '084 and claim 11 of application '438 are designated to

corresponding to count 1 because both claims are identical, and both claims are directed to the

following identical language : " A storage device having erase operation reference means for

storing a number of erase operations of respective erasing sector groups each of which comprises

one or more physical sectors erased together in on erasing operation when erasing data stored in

the physical sector included in the erasing sector groups, and erasing control means for erasing the

erasing sector groups in the erasing operations, referring to said erase operations reference means,

in which the number of erasing operations performed by the erasing sector groups are averaged.

Claim 19 of application '084 and claim 13 of application '483 are designated a

corresponding to count 1 because both claims are identical, and both claims are directed to the

following identical language : "A storage device having a status reference means for storing status

information indicating a status in which the physical sector is filled up with written data and a

status in which no data is writable due to deterioration of the physical sector, for each of said

physical sectors, wherein said logical address conversion means converts the logical address

received in the writing operation to the physical address identifying the physical which is not in

said statuses, referring said status reference means."

Claim 20 of application '084 and claim 14 of application '483 are designated to as

corresponding to count 1 because both claims are identical, and both claims are directed to the

following identical language : " A storage device having a write sector pointer for storing said

physical address of the physical sector into which data should be written in the next data writing

operation, wherein said logical address conversion means converts said logical address said

physical address stored in said write sector pointer."

3.   Claims 1-8, 12, and 15-21 of application '438 are *not* designated as corresponding to

count 1 because these claims are directed a particular internal structure of a memory controller

and its substitute memory areas for use within a storage device.

4.   Any inquiry concerning this communication should be directed to Viet Nguyen at

telephone number (703) 308-4897.

V. Nguyen

1/10/98

Viet Q. Nguyen
Primary Examiner